

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	CASE NO. 20-41227
	§	
ROYAL TRANSPORT EXPRESS, LLC	§	
	§	CHAPTER 11
DEBTOR	§	
	§	

MOTION TO APPROVE AGREED ORDER
CONDITIONING THE AUTOMATIC STAY

YOUR RIGHTS MAY BE AFFECTED BY THE RELIEF SOUGHT IN THIS PLEADING. YOU SHOULD READ THIS PLEADING CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. IF YOU OPPOSE THE RELIEF SOUGHT BY THIS PLEADING, YOU MUST FILE A WRITTEN OBJECTION, EXPLAINING THE FACTUAL AND/OR LEGAL BASIS FOR OPPOSING THE RELIEF.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE SHOWN IN THE CERTIFICATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING WITH APPROPRIATE NOTICE. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

ENGs Commercial Finance Co. (“ENGs”) hereby submits this *Motion to Approve Agreed Order Conditioning Automatic Stay and Providing for Adequate Protection* (the “Motion”) and in support hereof states as follows:

1. ENGS requests that the Court enter the Agreed Order submitted herewith.
2. Good cause exists for granting the requested relief.

WHEREFORE, ENGS respectfully requests that the Court enter the Agreed Order submitted herewith and grant such other and further relief to which it may be entitled.

Respectfully submitted,

KANE RUSSELL COLEMAN & LOGAN PC

By: /s/ Michael P. Ridulfo
Michael P. Ridulfo
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Counsel for Engs Commercial Finance Co.

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of July, 2020, a true and correct copy of the foregoing document was served, via ECF and regular U.S. mail, on the parties on the attached mailing list.

/s/ Michael P. Ridulfo
Michael P. Ridulfo

Label Matrix for local noticing
 1540-4
 Case 20-41227
 Eastern District of Texas
 Sherman
 Filed Jul 1 16:57:01 CDT 2020

AT&T Document Page 3 of 4
 PO Box 630047
 Dallas, TX 75263-0047

BMO Harris Bank
 111 W Monroe
 Chicago, IL 60603-4095

Bank OZK
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COLLIN COUNTY TAX ASSESSOR/COLLECTOR
 Abernathy, Roeder, Boyd & Hullett, P.C.
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 MONROE LA 71203-4774

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 2300 Bloomdale Road, Ste. 2324
 McKinney, TX 75071-8517

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 2441 Warrenville Rd. Ste. 310
 Lisle, IL 60532-3642

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 15 S Ware
 Tampa, FL 33619-4444

Regus
 101 E Park, Ste. 600
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Royal Transport Express, LLC
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ACAR Leasing LTD d/b/a GM Financial Leasing
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Eric A. Lippert
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 Dallas, TX 75251-1329

Page 4 of 4

Henry Thomas Moran (SBRA V)
 HTM Trustee Services LLC
 521 W. Wilshire Blvd
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 Oklahoma City, OK 73116-7785

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Chase Bank
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 Palatine, IL 60094-4014

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ACAR Leasing LTD d/b/a GM Financial Leasing

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(u)Bahadur Dhesi

(d)Bank OZK
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(d)City of Wylie
 Linebarger Goggan Blair & Sampson, LLP
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 Total 47